


**ABA Professional Development**


**TEN YEARS AFTER ... DOES YOUR BSA/AML PROGRAM STAND THE TEST OF TIME?**

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**Moderator: Chris Spellman  
Morrill & Janes Bank**



**CRIMINAL JUSTICE**



**American Bar Association  
ABA Professional Development**



**Presenters**

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## Ten Years Ago-- 9/11/01

### Where were you?

- Background
  - Industry
  - Title
  - Experience



## Ten Years Ago

### Program

- Did you have one?
- What resources did you have?
- What was the focus?



## NOW- 9/11/11

Where are you doing now?

- Background
  - Industry
  - Title
  - Experience

What do you focus on now?



## Changing Expectations

Risk Assessments

- Overall
- Product/Services
- CIP
- OFAC



## Changing Expectations

### Account Opening Controls and Processes

- CIP
- CDD
- KYC
- EDD
  - Beneficial Ownership



## Changing Expectations

### Monitoring:

- Formal/Informal Processes
- OFAC and AML Monitoring
  - Automated vs Manual
  - 3<sup>rd</sup> Party Software
  - Types of Activity





## Changing Expectations

Training

Independent Reviews

BSA Officers Role



## Success Management

- How do you measure success?
- Board
- Management
- Regulators
- Law enforcement
- Have you merged Fraud and AML?



## Fraud Integration

- Merged or Separate?
- Lessons Learned



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## Emerging Issues & Trends

- Human Trafficking
- Ponzi Schemes
- Internet Transactions
- 3<sup>rd</sup> Party Payment Processors
- Mortgage Fraud
- Elder Abuse
- Tax Evasion
- Internet Gambling
- Prepaid Access Device
- ID Theft
- Fraud/Kiting
- Micro-Structuring
- Bulk Cash Smuggling
- International ACH
- ACH Fraud
- Peer Analysis
- MSBs & Cash Intensive businesses
- Remote Deposit Capture
- Automation
- Privacy vs CIP
- Money Mules
- Trade-based Money Laundering
- Country Blacklist-FATF
- Information Security, Account Takeover



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## What's Hot?

- Where will the industry be 10 years from now?
- Where will you be in 10 years?



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## Questions?

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